

**UNITED STATES DISTRICT COURT DISTRICT OF  
NEW JERSEY**

**IN RE JOHNSON & JOHNSON  
TALCUM POWDER  
PRODUCTS MARKETING,  
SALES PRACTICES, AND  
PRODUCTS LIABILITY  
LITIGATION**

*This document relates to:*

MERRITT BENSON, INDIVIDUALLY  
AND AS THE PERSONAL  
REPRESENTATIVE OF THE ESTATE OF  
ARLENE BENSON; MERRITT F.  
BENSON, JR.; AND LAVINIA BENSON,

Plaintiffs,

v.

JOHNSON & JOHNSON; JOHNSON &  
JOHNSON CONSUMER, INC.; IMERY'S  
TALC AMERICA, INC. F/K/A LUZENAC  
AMERICA, INC.; AND PERSONAL CARE  
PRODUCTS COUNCIL F/K/A COSMETIC,  
TOILETRY AND FRAGRANCE  
ASSOCIATION (CTFA)

Defendants.

**MDL NO. 16-2738 (FLW) (LHG)  
JUDGE FREDA L. WOLFSON MAG.  
JUDGE LOIS H. GOODMAN**

COMPLAINT AND JURY DEMAND

Civil Action No.: 3:17-cv-7188

DIRECT FILED ACTION

**NOTICE OF FILING**  
**SHORT FORM COMPLAINT**

Notice is hereby given, pursuant to the Case Management Order No. 3 (Filing of Short Form Complaint), that the Short Form Complaint with Jury Demand was filed on September 18, 2017 on behalf of Merritt Benson, Individually and as the Personal Representative of the Estate of Arlene Benson; Merritt F. Benson, Jr.; and Lavinia Benson.

Dated: September 18, 2017

Respectfully Submitted by,

/s/Haytham Faraj

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**Counsel for Plaintiff(s)**

### **CERTIFICATE OF SERVICE**

I hereby certify that on September 18, 2017, a copy of the foregoing was filed electronically. Service of the filing will be made on all ECF-registered counsel by operation of the Court's electronic system. Parties may access this filing through the court's system.

/s/Haytham Faraj